

REMARKS

This responds to the Office Action dated January 5, 2006.

Claims 1, 5, and 12 are amended; as a result, claims 1-17 are now pending in this application. Applicants respectfully assert that the claim amendments are made to place the application in condition for allowance. Thus, the amendments are believed to be appropriate and Applicants respectfully request that they be entered.

§103 Rejection of the Claims

Claims 1-17 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Bennett et al. (U.S. 5,146,344). It is of course fundamental that in order to sustain an obviousness rejection that each and every element of the rejected claims must be taught or suggested in the cited reference.

At the outset, Applicants note that the Examiner asserts that the previous amendment adding the terminology of “separate and apart” is considered sufficient by the Examiner to overcome the prior 112 rejections, but the Examiner asserts that separate does not mean something is “not integrated.” That is, the Examiner asserts that the Printing Wiring Boards (PWB’s) of Bennett are sufficient to be considered “separate and apart” from the controllers because the Examiner is interpreting the PWB’s of Bennett as being separate and apart and still integrated.

Applicants’ prior attempts to use the term “external” in the claims were rejected under section 112. Yet, the Examiner acknowledges that much of the arguments presented were applicable to that terminology and was not considered because the term was removed from the claims and it makes not sense to address the issue.

Essentially and substantively what the Applicants are trying to communicate is the following. Bennett is directed to a standalone integrated printer system that includes a variety of features all of which are integrated into that system. There is no motivation, teaching, or desire to remove features from that standalone printer system or to offload the features over a network connection to external and remote locations. This was elaborately discussed in the prior response to an Action of the Examiner. Bennett wants to sell and teach a monolithic and

centralized printing system having a variety of features, some of these features may be accessed by remote users but the features themselves are integrated within the same printer system in a same geographic location.

The Bennett architecture is not a client-server construction. In fact, there is no mention or discussion of server capabilities at all with the printer system in Bennett. Users access all features to the printer system by connecting directly to that printer system. Applicants believe that the Examiner does not disagree with this interpretation based on the latest remarks of the Examiner.

Conversely, the Applicants' invention is fundamentally directed to a different architecture entirely that processes in a different manner because of that different architecture. That is, Applicants' architecture is directed towards a client-server construction, where certain features of a printer may be independent and geographically dispersed from the physical printer and its hardware and software. Again, this was elaborated discussed in the prior actions and in the original filed specification. Essentially, printing services are provided over a network via a server and those services need not be specific to any particular printer hardware.

This point appears to have been acknowledged by the Examiner when the Examiner addresses these arguments by asserting the points are directed to the word "external," which was redacted out of the claims in response to the Examiner's 112 rejections. The Examiner does not address the points because it is believed the points are not relevant to the added language of "separate and apart," in view of how the Examiner has interpreted that phrase vis-à-vis the PWB of Bennett. The Examiner claims "it does not make sense to argue a scenario, which is not claimed." Final Office Action, page 4, last sentence on the page.

Applicants respectfully disagree; specifically, Applicants believe that the terminology of "separate and apart" was sufficient to encompass the prior argument and should have been considered by the Examiner. However, in an effort to expedite the prosecution history and to have the Examiner consider what Applicants' believe to be fundamentally different with the Bennett reference, Applicants have amended the claims to show the significant difference in architecture and the processing because of the different architecture between Applicants' invention and the Bennett reference.

More particularly, Applicants' have now amended the claims such that the accounting support services communicate with the printer and printer agent over the Internet. This new limitation combined with the "separate and apart" should demonstrate sufficiently the architectural difference and processing difference with Bennett. Any communications between PWB's are all local bus communications and not occurring over the Internet. That is, features in Bennett are local to and locally integrated with the printing system; the features are not separated and accessible in a client-server arrangement over the Internet.

Support for this claim addition may be found in a variety of locations in the original filed specification. As one example the Examiner's attention is directed to FIG. 1, reference number 150, and page 5, first sentence of second full paragraph (*e.g.*, "such as the Internet"). The Examiner is also directed to the server 300 and its related discussion throughout the specification. Features are offloaded and external to the printer or printer agent. Although the Examiner objected to the term "external" not being present in the specification, functionally that information was present in the original filed specification by way of the client-server configuration and discussion. Applicants believe the new claim language is support in the specification and Applicants respectfully request that the Examiner address the major distinction between Bennett and the invention in a substantive manner.

Therefore, Applicants assert the claims are in condition for allowance and respectfully request an indication of the same.

CONCLUSION

Applicants respectfully submit that the claims are in condition for allowance and notification to that effect is earnestly requested. The Examiner is invited to telephone Applicants' attorney (513) 942-0224 to facilitate prosecution of this application.

If necessary, please charge any additional fees or credit overpayment to Deposit Account No. 19-0743.

Respectfully submitted,


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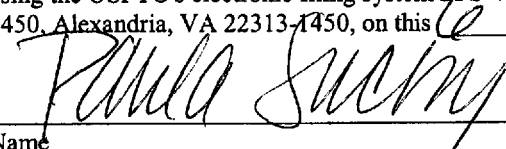
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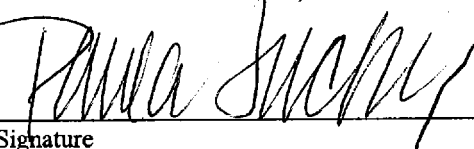

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CERTIFICATE UNDER 37 CFR 1.8: The undersigned hereby certifies that this correspondence is being filed using the USPTO's electronic filing system EFS-Web, and is addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on this 6 day of March, 2006.

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